

ORIGINAL

AUSA: MARGARET GRAHAM  
PETER DAVIS

24 MAG 2024

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GLEN GILLIARD,

a/k/a GLEN GILLARD,

Defendant.

**COMPLAINT**

Violations of 18 U.S.C. § 922(g)(1)

COUNTY OF OFFENSE:  
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL CASTILLO, being duly sworn, deposes and says that he is a Detective with the New York City Police Department ("NYPD"), and charges as follows:

**COUNT ONE**

**(Possession of Ammunition After a Felony Conviction)**

1. On or about September 16, 2023, in the Southern District of New York and elsewhere, GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, two .380 caliber Auto shell casings, and the ammunition was in and affecting commerce.

(Title 18, United States Code, Section 922(g)(1).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

2. I am a Detective with the NYPD. This affidavit is based upon my conversations with law enforcement personnel, my review of security camera footage, my review of NYPD officer body camera footage, and my examination of NYPD reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. Based on my review of NYPD reports and records, my review of surveillance footage, and my discussions with other law enforcement personnel, I have learned the following:

a. On or about September 16, 2023, at approximately 8:12 p.m., surveillance video showed an individual (the "Shooter") firing multiple shots at another individual (the "Target") in the vicinity of 2001 University Avenue in the Bronx, New York (the "Building").

b. The Building is on the east side of its block. On the west side of this same block -- in other words, behind the Building -- is 1950 Andrews Avenue (the "Andrews Building"). The Andrews Building is listed as the address of GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, in multiple NYPD records going back to at least 2013. This includes a domestic incident that occurred in or about 2020, during which GILLIARD gave the Andrews Building as his address. In or about November 2023, an NYPD officer visited an apartment in the Andrews Building at approximately 5:30 a.m. and spoke with GILLIARD's sister, who was present in the apartment at that early hour, suggesting that she resides in the Andrews Building. The officer asked if GILLIARD was in the apartment and GILLIARD's sister stated that GILLIARD was not present and did not live in the Andrews Building. From my training and experience, I know that subjects' close family members often lie to the police about the subjects' whereabouts. Further, even if GILLIARD does not currently reside at the Andrews Building, the facts set forth above show that he has a connection to the Andrews Building, as his sister appears to currently reside there and there is evidence that GILLIARD has lived at the Andrews Building in the past.

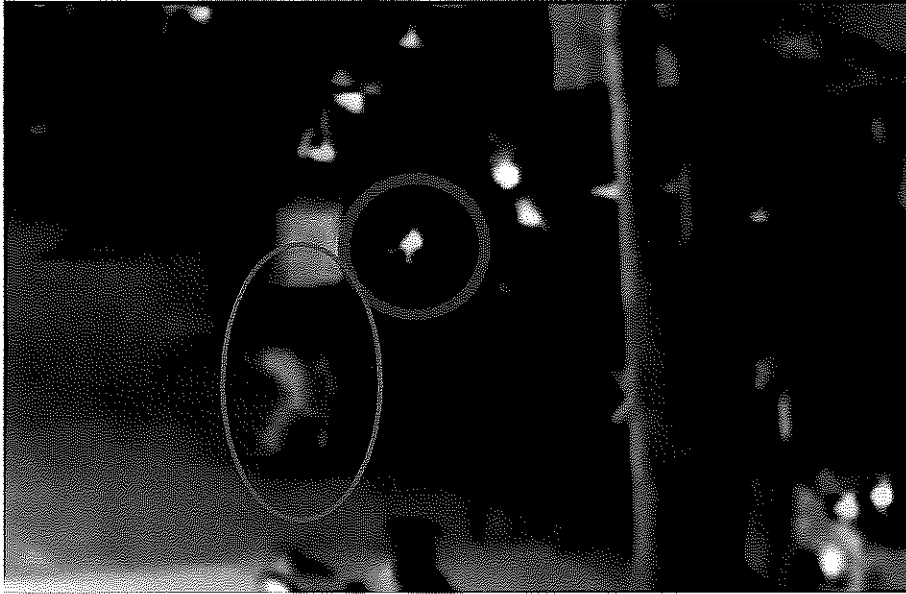
c. Several minutes before the shooting, at approximately 8:09 p.m., surveillance video showed the Target approaching the Shooter in front of the Building. The two appeared to exchange words, and the Shooter then walked west along the south side of the block, away from the Building and towards the Andrews Building. While the Shooter was walking, the Target ran up behind the Shooter, pushed the Shooter, and swung at the Shooter's head while holding what appeared to be a long metal object. During this encounter, the Shooter was wearing what appeared to be dark blue pants, black sneakers, and a white T-shirt, with a black item of clothing draped over his shoulder. After this altercation, the Shooter continued walking west.

d. At approximately 8:11 p.m., surveillance video showed the Shooter returning to the vicinity of the Building along the south side of the block, this time walking east. The Shooter was now walking quickly and was wearing what appeared to be the same dark blue pants and black sneakers. The Shooter was now wearing a black hooded sweatshirt, and kept one or both hands in the front pouch of his sweatshirt.

e. At approximately 8:12 p.m., surveillance video showed the Shooter arrive in front of the Building, pull his right arm out of the front pouch of his sweatshirt and run toward the Target with his right arm extended in front of him. The Target fled, and the Shooter chased him between several parked cars at close range. The Shooter is circled in red below, and the Target is circled in blue.



4. Surveillance video showed the distinctive flash of light sometimes seen when a gun is fired, often called a “muzzle flash,” as the Shooter chased the Target. This muzzle flash is shown below, circled in red. The Target is again circled in blue.



5. Surveillance video showed the Target then fleeing east and the Shooter running north, away from the Building.

6. Surveillance video showed the Shooter entering the lobby of the Andrews' Building after the shooting, at approximately 8:14 p.m. An NYPD detective took a still photograph of this surveillance video, which showed a clear view of the Shooter's face and body (the "Lobby Photograph").

7. Several hours after the shooting, NYPD officers recovered two .380 caliber Auto shell casings from the vicinity of the shooting (the "Shell Casings").

8. Based on my discussions with a Special Agent from the Bureau of Alcohol, Tobacco, Firearms and Explosives who is familiar with the manufacturing of firearms and ammunition, and who reviewed the shell casing evidence collected by the NYPD, I know that the Shell Casings were not manufactured in New York State.

9. In or about November 2023, an NYPD detective who was familiar with GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, viewed the Lobby Photograph and identified the individual in the photograph as GILLIARD. The NYPD detective was familiar with GILLIARD because the detective had observed GILLIARD at close range in or about August 2020 during a post-arrest interview.

10. From my discussions with other NYPD officers, I know that GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, was arrested on state charges on or about November 28, 2023. After his arrest, and after being given *Miranda* warnings, GILLIARD identified himself as the individual in the Lobby Photograph. In other words, GILLIARD identified himself as the individual referred to throughout this Complaint as the Shooter.

11. Based on my review of law enforcement and court databases, I know that on or about April 2, 2015, GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, was convicted in

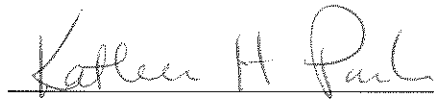
the United States District Court for the Southern District of New York of conspiracy to distribute cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B), which is a felony that carries a maximum term of imprisonment of more than one year. GILLIARD was sentenced to 74 months' imprisonment in connection with this conviction.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of GLEN GILLIARD, a/k/a GLEN GILLARD, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



DANIEL CASTILLO  
Detective  
New York City Police Department

Sworn to before me this 17th day of January, 2024.



THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York